

1 BARRY J. PORTMAN
Federal Public Defender
2 NED SMOCK
Assistant Federal Public Defender
3 555 - 12th Street
Suite 650
4 Oakland, CA 94607-3627
Telephone: (510) 637-3500
5
Counsel for Defendant HILLYER
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	No. CR-09-0982 PJH
)	
12 Plaintiff,)	DECLARATION OF NED SMOCK AND
)	[PROPOSED] ORDER TO MODIFY
13 vs.)	TRAVEL RESTRICTION
)	
14 RANNI HILLYER,)	
)	
15 Defendant.)	
_____)	

16

17 I, Ned Smock, declare the following:

- 18 1. Ranni Hillyer first appeared before this court on October 21, 2009. Counsel for Ms.
19 Hillyer at that appearance did not provide the Court with information about Ms.
20 Hillyer's need to travel for work. As a result, the Court imposed a travel restriction
21 limiting Ms. Hillyer's travel to the Northern and Southern Districts of California.
- 22 2. Ms. Hillyer is an employee of Aero Financial, a consulting and private equity firm.
23 Her position requires her to travel frequently to visit both investors and companies
24 managed under Aero. Without the ability to travel, Ms. Hillyer will be unable to
25 fulfill the expectations and needs of her employer.
- 26 3. Accordingly, I am asking that Ms. Hillyer's conditions of pretrial release be

1 amended to allow travel within the continental United States so long as she provides
2 at least 24 hour notice and travel details to her United States Pretrial Services
3 Officer and receives prior approval from that officer.

4 4. The Pretrial Services officer, Paul Mamaril, has no objection to this request. I have
5 also spoken with the assigned Assistant United States Attorney, Cynthia Stier, about
6 the request. She informs me that she does not object to the modification.

7 I declare that the foregoing is true to the best of my information and belief.

8
9 Dated: December 1, 2009

/S/

NED SMOCK
Assistant Federal Public Defender

10
11
12 **[PROPOSED] ORDER**

13 Good cause appearing therefore, it is the ORDER of this Court that the conditions
14 of release for Ranni Hillyer are modified to allow her to travel within the continental
15 United States provided that she gives at least 24 hour notice and travel details to her
16 assigned United States Pretrial Officer and receives prior approval from the officer.

17
18 Dated: December __, 2009

HON. TIMOTHY J. BOMMER
United States Magistrate Judge